

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: New York City Policing During
Summer 2020 Demonstrations

20 Civ. 8924 (CM)(GWG)

This filing is related to:

ALL CASES

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Rules 37(a) of the Federal Rules of Civil Procedure, Plaintiffs will move this Court before the Honorable Gabriel W. Gorenstein, United States Magistrate Judge, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date and time to be determined by the Court, for a decision and order precluding Defendants from relying upon facts redacted or contained in documents completely withheld on the basis of the law enforcement privilege. Plaintiffs file the attached Memorandum of Law in Support of the Motion to Preclude Defendants' Reliance on Material Withheld on Law Enforcement Investigative Privilege Grounds, and the Declaration of Lillian Marquez with supporting exhibits.

PLEASE TAKE FURTHER NOTICE that, pursuant to agreement of the parties and in accordance with the Court's Individual Practices at Rule 2(B), Defendants' opposition is due by April 25, 2023; and Plaintiffs' reply, if any, by May 2, 2023.

Dated: April 11, 2023
New York, New York

Respectfully submitted,

LETITIA JAMES
Attorney General of the State of New York
Attorney for Plaintiff in 1:21-cv-00322

By: /s/ Lillian Marquez

Lillian M. Marquez
Assistant Attorney General
Office of the New York
State Attorney General
28 Liberty Street
New York, N.Y. 10005
(212) 416-6201
Lillian.Marquez@ag.ny.gov

BELDOCK LEVINE & HOFFMAN LLP

By:



Jonathan C. Moore
David B. Rankin
Luna Droubi
Marc Arena
Deema Azizi
Rebecca Pattiz
Katherine "Q" Adams
Regina Powers

99 Park Avenue, PH/26th Floor
New York, New York 10016
t: 212-490-0400
f: 212-277-5880
e: jmoore@blhny.com
drankin@blhny.com
ldroubi@blhny.com
marena@blhny.com
dazizi@blhny.com
rpattiz@blhny.com
qadams@blhny.com
rpowers@blhny.com

WYLIE STECKLOW PLLC



By: Wylie Stecklow
Wylie Stecklow PLLC
Carnegie Hall Tower
152 W. 57th Street, 8th Floor
NYC NY 10019
t: 212 566 8000
Ecf@wylielaw.com

GIDEON ORION OLIVER



277 Broadway, Suite 1501
New York, NY 10007
t: 718-783-3682
f: 646-349-2914
Gideon@GideonLaw.com

COHEN&GREEN P.L.L.C.

By:



Elena L. Cohen
J. Remy Green
Jessica Massimi

1639 Centre Street, Suite 216
Ridgewood (Queens), NY 11385
t: (929) 888-9480
f: (929) 888-9457
e: elena@femmelaw.com
remy@femmelaw.com
jessica@femmelaw.com

LORD LAW GROUP PLLC



Masai I. Lord
14 Wall St., Ste 1603
New York, NY 10005
P: 718-701-1002
E: lord@nycivilrights.nyc

Counsel for Plaintiffs in Sow v. City of New York, No. 21-cv-533

NEW YORK CIVIL LIBERTIES UNION FOUNDATION

s/ Daniel Lambright

Molly K. Biklen

Daniel R. Lambright

Jessica Perry

Robert H. Hodgson

Veronica Salama

Lisa Laplace

Christopher T. Dunn

New York Civil Liberties Union Foundation

125 Broad Street, 19th Floor

New York, N.Y. 10004

(212) 607-3300

dlambright@nyclu.org

Co-Counsel for Plaintiffs in Payne v. De Blasio, No. 20-cv-8924

THE LEGAL AID SOCIETY

s/ Corey Stoughton

Corey Stoughton

Jennvine Wong

Rigodis Appling

Paula Garcia-Salazar

The Legal Aid Society

199 Water Street

New York, N.Y. 10038

(212) 577-3367

cstoughton@legal-aid.org

Co-Counsel for Plaintiffs in Payne v. De Blasio, No. 20-cv-8924

DAVIS WRIGHT TREMAINE LLP

By: s/ Robert D. Balin

Robert D. Balin

Nimra H. Azmi

Abigail Everdell

Kathleen Farley

1251 Avenue of the Americas, 21st Floor

New York, New York 10020

Phone: (212) 489-8230

Fax: (212) 489-8340

robbalin@dwt.comabigaileverdell@dwt.com

kathleenfarley@dwt.com

Mickey H. Osterreicher

General Counsel

NATIONAL PRESS PHOTOGRAPHERS

ASSOCIATION

70 Niagara Street

Buffalo, New York 14202

Tel: (716) 983-7800

Fax: (716) 608-1509

lawyer@nppa.org

Wylie Stecklow
WYLIE STECKLOW PLLC
Carnegie Hill Tower
152 W. 57th Street, 8th Floor
NY NY 10019
(t) 212 566 8000
ecf@WylieLAW.com

Alicia Calzada (*pro hac vice*)
ALICIA WAGNER CALZADA, PLLC
Deputy General Counsel
National Press Photographers Association
12023 Radium , Suite B1
San Antonio, TX 78216
210-825-1449
Alicia@calzadalegal.com

Counsel for Plaintiffs in Gray, et al v. City of New York, et al, No. 21-cv-06610

The Aboushi Law Firm PLLC



Tahanie A. Aboushi, Esq.
Aymen A. Aboushi, Esq.
The Aboushi Law Firm
1441 Broadway, 5th Floor
New York, NY 10018
Tel: (212) 391-8500
Fax: (212) 391-8508
Aymen@Aboushi.com
Tahanie@Aboushi.com

Counsel for Plaintiffs in Rolon, et al v. City of New York, et al, No. 21-cv-2548

To: All Counsel of Record